

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NANCY BOHNAK and JANET LEA SMITH,  
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

MARSH & MCLENNAN COMPANIES, INC. et al.,

Defendants.

Case No. 21-CV-6096-AKH

**ORAL ARGUMENT REQUESTED**

**NOTICE OF DEFENDANTS' MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and all prior proceedings, pleadings, and filings in this action, Defendants Marsh & McLennan Companies, Inc. and Marsh & McLennan Agency LLC hereby move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order dismissing with prejudice all claims in Plaintiffs' Class Action Complaint (the "Complaint") filed on July 15, 2021 (Case No. 21-CV-6096, ECF No. 1), and awarding such other relief as the Court may deem just and proper. Defendants bring this Motion to Dismiss the Complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) for lack of subject-matter jurisdiction and failure to state claims upon which relief can be granted.

Dated: October 8, 2021

Respectfully submitted,

**COOLEY LLP**

By: /s/ Travis LeBlanc  
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